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5 Counsel for Defendant YUEN

FILED

JUL 14 2006

RICHARD V. [Signature]
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,)

No. CR 06-00238 JW

11 Plaintiff,)

12 v.)

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE STATUS DATE**

13)
14 SUZIE MOY YUEN,)

15 Defendant.)

16
17 Assistant United States Attorney Carlos Singh and defendant, Suzie Moy Yuen, through
18 her counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the
19 status date in the above-captioned matter, presently scheduled for Monday, July 17, 2006, should
20 be continued to Monday, September 25, 2006, at 1:30 p.m.

21 The parties stipulate and agree that the status date should be continued because counsel
22 for Ms. Yuen needs additional time to investigate this case and to collect other records before
23 advising Ms. Yuen as to whether or not she should file motions, enter a plea or proceed to trial.
24 Also, counsel for Ms. Yuen plans to request additional discovery from the government and
25 government counsel needs time to decide what, if anything, it will agree to produce.

26 The parties further stipulate and agree to continue the status date in this case because a
Rule 15 deposition of the alleged victim in this case is scheduled to take place next month—on
August 14 and August 15, 2006.

1 Finally, the parties stipulate and agree that under 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv),
2 the ends of justice served by the continuance requested outweigh the best interest of the
3 defendant and public in a speedy trial because the failure to grant such a continuance would
4 unreasonably deny Ms. Yuen continuity of counsel and the time necessary for effective
5 preparation, taking into account the exercise of due diligence.

6
7 Dated: July 13, 2006

_____/s/_____
ANGELA M. HANSEN
Assistant Federal Public Defender

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9
10 Dated: July 13, 2006

_____/s/_____
CARLOS SINGH
Assistant United States Attorney

FILED

JUL 14 2006

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUZIE MOY YUEN,

Defendant.

No. CR 06-00238 JW

JW
**[PROPOSED] ORDER CONTINUING
STATUS DATE AND EXCLUDING
TIME**

The parties have jointly requested to continue the status date set for July 17, 2006 to September 25, 2006, GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the status date presently set is continued to September 25, 2006, at 1:30 p.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from July 17 through and including September 25, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

Dated: July 14, 2006

James Ware
JAMES WARE
United States District Judge

1 Distribute to:

2

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